

U.S. District Court (MI)

Curtis #492630

v

Stallman

**FILED - GR**

May 31, 2022 12:54 PM

CLERK OF COURT

U.S. DISTRICT COURT

WESTERN DISTRICT OF MICHIGAN

BY:JMW SCANNED BY: KB/5/31

**2:22-cv-114**

**Maarten Vermaat**

**U.S. Magistrate Judge**

Complaint

42 USC 1983

\*

I request for a Magistrate to decide my case  
pursuant to 28 USC 636(c) .

Previous Lawsuits

#1. 6th Circuit COA Case # 21-1822

#2. MI U.S. Dist. Court Case # 1:22-CV-163

#3. MI U.S. Dist. Court Case # 1:22-CV-266

Parties

Plaintiff : Willie Curtis

Ionia Correctional Facility

1576 Bluewater

Ionia, MI 48846

Prison Incident Occurred At : Chippewa Correctional Facility.

Defendant : Timothy Stallman (Prison's Doctor)

Chippewa Correctional Facility

4269 M-80

Kincheloe, MI 49784

Capacity Being Sued : Both Official And Personal.

Affidavit And Verification OF Truth

I swear to, and verify that, everything stated in this complaint, is true.

5/24/22 Willie Curtis. 28 USC 1746.

**Syllabus**

- #1. The facts of this complaint, are from (2 years) ago, the year 2020.
- #2. Further, in order to give this court a full understanding of my pain and suffering, I must give background information, beginning from the year 2012.
- #3. In regards to the various prisons' healthcares that I have contacted about my health-issues, I have always complained of symptoms of Herpes-Simplex-Virus and Mollaret's-Meningitis, beginning in the year 2012.
- #4. See, All of Plaintiff's-Attachments. (Attachments #1 - # 17 ).
- #5. As of the year 2022, I am discouraged by the MDOC's past refusal to treat my Herpes-Simplex-Virus and Mollaret's-Meningitis.
- #6. As such, I have given-up hope and quit asking the MDOC for (HSV) and Mollaret's-Meningitis treatment.
- #7. Instead, I have opted to endure daily-pain from my (HSV)-infection, hoping to be released on parole soon, where I can go to a "real hospital" and get some "real help"

Facts

#8. On July 8<sup>th</sup> 2020, at the Chippewa Correctional Facility, I had a Doctor's appointment with (Mr. Stallman).

#9. And at that time, I reported to (Mr. Stallman) that all of my health-issues, that I had complained about over the past (8 years), are the results of a wide-spread, untreated, Herpes - Simplex - Virus (HSV), that is wreaking havoc throughout my body.

#10. I then told (Mr. Stallman) that I have an (HSV) diagnosis already on my Electronic - Medical - Record, entered on the date of September 22<sup>nd</sup> 2016.

#11. See, Plaintiff's - Attachments. (Attachments # 11 - #12).

#12. My (HSV)-infection is a serious - medical - condition.

#13. The Brock-Case Held: "Merely because a condition might be characterized as cosmetic does not mean its seriousness should not be analyzed."  
Brock v Wright 315 F3d 158.

#14. See, Plaintiff's - Attachments. (Attachments # 1 - # 5).

#15. I then told (Mr. Stallman) that my (HSV) has given me Mollaret's - Meningitis, which is causing me to have brainaches, everyday, for the past (8 years) straight.

# 16. I then told (Mr. Stallman) that my (HSV) is causing me to feel "pulsations", which are shooting-pains, throughout my body, everyday, for (8 years) straight.

#17. I then told (Mr. Stallman) that my (HSV) is causing me to see hallucinations and to go blind, periodically, over the past few years.

#18. I then asked (Mr. Stallman) for a spinal-Tap-test to check me for Mollaret's - Meningitis.

#19. I then asked (Mr. Stallman) to, as an alternative to a spinal-tap-test, just give me anti-viral medication, on a (30 day) trial-basis, to treat my (HSV), to see if it eases my daily-painful-symptoms.

#20. (Mr. Stallman) then told me that he was not qualified nor capable to give me a spinal-tap-test; that I would have to be authorized to see a real-world-doctor to get a spinal-tap-test; that he would take my concerns of Mollaret's - Meningitis and request for a spinal-tap-test into consideration.

#21. See, Plaintiff's - Attachments. (Attachments #15 - #16).

#22. Because the MDOC had been refusing to treat my (HSV) for that past (8 years), I had a habit of keeping extra copies of my medical-records and print-outs of (HSV)-information, on hand, where I would send them to outside-organizations, in attempts to obtain outside-medical-help.

#23. At the conclusion of said Doctor's appointment, not trusting him to take my (HSV) seriously, I then told (Mr. Stallman) that I would be mailing to him a copy of my September 22<sup>nd</sup> 2016 (HSV)-diagnosis-record and print-outs of (HSV)-information, to help guide him in his decision regarding my possibly getting treatment for my (HSV)-infection. I then left.

#24. Upon the return to my cell, I gathered together a copy of my September 22<sup>nd</sup> 2016 (HSV)-diagnosis and a print-out of (HSV)-information, put them in an envelope, and sent it to (Mr. Stallman) by way of the institutional-mailing-system, on that very same day, July 8<sup>th</sup> 2020.

#25. Nothing ever came out-of my July 8<sup>th</sup> 2020 Doctor's appointment; (Mr. Stallman) refused to treat my (HSV), in violation of the 8<sup>th</sup> Amendment.

#26. (Mr. Stallman) Knew that I had (HSV) because I told him that I had (HSV).

#27. The Hayes-Case Held : "Self-reporting is often the only indicator a doctor has of a patient's condition."  
Hayes v Snyder 546 F3d 516.

#28. Further, I even provided (Mr. Stallman) with a copy of my September 22<sup>nd</sup> 2016 (HSV)-diagnosis for his own perusal.

#29. Further, (Mr. Stallman) knew that my (HSV) could have been the source of the daily-pain that I had been feeling for that past (8 years), and that my (HSV) could have given me Mollaret's - Meningitis, because I provided (Mr. Stallman) with a print-out of (HSV)-information from the World - Health - Organization, which explained what (HSV) does to the human-body.

#30. The Hudak-Case Held: "He merely refused to verify underlying facts that he strongly suspected to be true".  
Hudak v Miller 28 FSUPP 2d 827.

#31. Finally, I have exhausted all of my administrative-remedies at:  
Grievance Identifier # URF-20-07-18-91-12D1.

#32. See, Plaintiff's - Attachments. (Attachment #17).

Relief Requested

#33. Lastly, I request Damages - Relief .

#34. I want damages for my suffering from an untreated Herpes-infection for the past (10 years).

#35. I also want damages for the brain-damage, bodily-injury, disability, and disfigurement, that I have sustained due to an untreated Herpes-infection, that will cause me to have future suffering.

#36. The Williams-Case Held : "certainly can be compensated for bodily injury, past and future suffering, disability, and disfigurement".  
Williams v Patel 2000 US Dist Lexis 10321.

#37. I want (\$5 million) in compensatory-damages, and another (\$5 million) in punitive-damages.

#38. IF the Defendant does not agree, I want a Jury-Trial .

5/24/22

Willie Curtis

28 USC 1746.

Willie Curtis #492630  
1576 Bluewater  
Ionia, MI 48846



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